

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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D. JOSEPH KURTZ, Individually and on	:	Civil Action No. 1:14-cv-01142-PKC-RML
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
KIMBERLY-CLARK CORPORATION, et al.,	:	
	:	
Defendants.	:	
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GLADYS HONIGMAN, Individually and on	:	Civil Action No. 2:15-cv-02910-PKC-RML
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
KIMBERLY-CLARK CORPORATION,	:	
	:	
Defendant.	:	
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**DECLARATION OF VINCENT M. SERRA IN SUPPORT OF PLAINTIFFS'
SUPPLEMENTAL BRIEF IN RESPONSE TO THE COURT'S SEPTEMBER 9, 2022
ORDER AND IN FURTHER SUPPORT OF PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT**

I, VINCENT M. SERRA, declare as follows:

1. I, Vincent M. Serra, am an attorney duly licensed to practice in the States of New York and California, and in the District of Columbia, a partner of the law firm Robbins Geller Rudman & Dowd LLP (“Robbins Geller” or “Class Counsel”), and I represent plaintiffs, Dr. D. Joseph Kurtz and Gladys Honigman (“Plaintiffs”), in these actions (the “Litigation”). I have been actively involved in the prosecution and resolution of the Litigation, am familiar with its proceedings, and have knowledge of the matters set forth herein based upon my involvement in this Litigation and supervision of or communications with other lawyers and staff assigned to this Litigation.

2. Attached are true and correct copies of the following exhibits:

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| Exhibit A | Third Supplemental Declaration of Jeanne C. Finegan, APR, Concerning Media Process and Methodology Questions, dated Oct. 11, 2022 |
| Exhibit B | Settlement Order and Final Judgement, filed in <i>Meta v. Target Corp.</i> , No. 4:14-cv-0832 (DCN) (N.D. Ohio Aug. 8, 2018), ECF No. 179 |
| Exhibit C | Declaration of Jonathan Shaffer and Post-Distribution Accounting, filed in <i>Pettit v. Procter & Gamble Co.</i> , No. 3:15-cv-2150-RS (N.D. Cal. July 17, 2019), ECF No. 139 |

3. I respectfully submit this Declaration in support of Plaintiffs’ Supplemental Brief in Response to the Court’s September 9, 2022 Order and in Further Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of October, 2022.

/s/ Vincent M. Serra
VINCENT M. SERRA